

## **REMARKS/ARGUMENTS**

### **Status of Claims**

Claims 18-42, all of which have been newly added, are pending in this application. Claims 9-17 have been cancelled herein without prejudice or disclaimer.<sup>1</sup> Claims 18 and 31 are independent.

### **Overview of the Office Action**

In the Office Action, claims 9-17 are rejected under 35 U.S.C. § 102 as anticipated by Lantto (WO 02/01822) in view of what is deemed to be Applicant admitted prior art.

Applicant notes that the basis of rejection should have been stated as obviousness under 35 U.S.C. § 103(a), because the rejection relies on a cited reference in conjunction with admitted prior art. An anticipation rejection, on the other hand, requires that the cited reference disclose all of the claim limitations, but as acknowledged at page 4 of the Office Action, Lantto does not disclose all of the limitations of claims 9-17. Accordingly, in this response, Applicant has considered the grounds of rejection to be obviousness under 35 U.S.C. § 103(a). Applicant requests clarification of the basis of rejection under 35 U.S.C. § 102, should it be maintained, in the next communication.

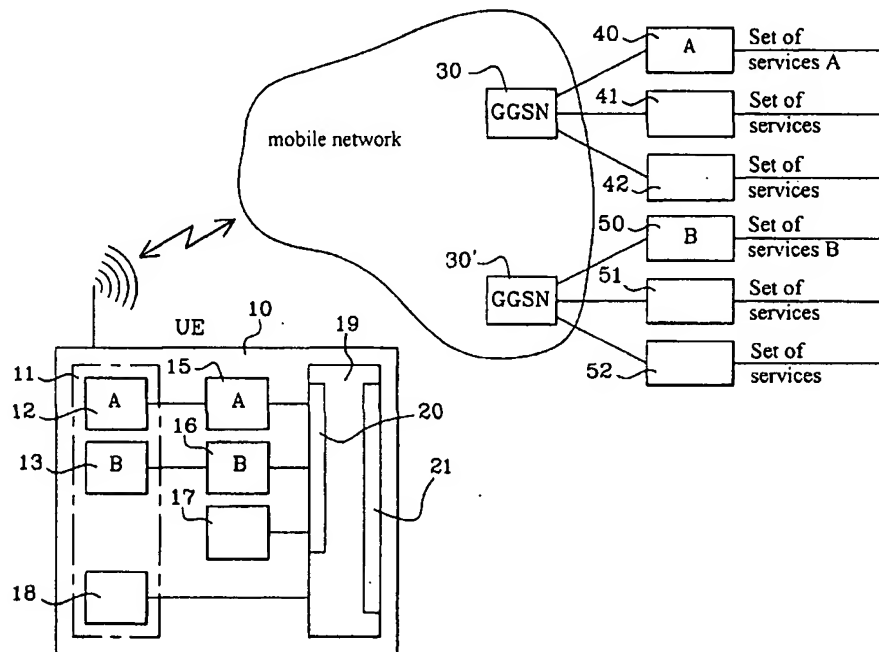
### **Summary of Subject Matter Disclosed in the Specification**

The following descriptive details are based on the specification. They are provided only for the convenience of the Examiner as part of the discussion presented herein, and are not intended to argue limitations which are unclaimed.

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<sup>1</sup> Claims 1-8 were previously cancelled in the Preliminary Amendment filed May 31, 2005.

Referring to Fig. 1, reproduced below, the embodiments disclosed in the present application relate to a terminal (10) for simultaneously communicating with multiple communications networks. As shown in Figure 1, the terminal has a user interface (11) which has an integrated selector (18) that allows a user to select a particular communications network (40, 41, 42, 50, 51, 52) and perform particular functions with respect to that network, such as creation, modification, suspension, or closure, of a connection.



The terminal (10) has a set of dedicated architectures (15, 16, 17), which are connected to the user interface (11) and configured for communication with at least one of the communications networks. Once a connection to a communications network is established, the respective dedicated architecture (15, 16, 17) presents content to the user via the user interface (11), e.g., via a displayed homepage (12, 13).

The terminal also has a dedicated architecture manager (19), which is configured to provide simultaneous connection to more than one of the communications networks. The dedicated

architecture manager (19) is connected to the user interface (11) and is connected between the dedicated architectures (15, 16, 17) and a radio input/output of the terminal (this connection is not depicted in the figure). The dedicated architecture manager (19) includes a first transmission means (20), which it uses to communicate with the dedicated architectures (15, 16, 17), and a second transmission means (21), e.g., a network interface, which it uses to communicate with the communications networks. The dedicated architecture manager (19) is configured to assign the dedicated architectures (15, 16, 17) to respective ones of the communications networks.

As noted above, the user interface (11) has a selector (18) that allows a user to select a particular communications network (40, 41, 42, 50, 51, 52) and perform particular functions with respect to that network. Based on the user selection made through the selector (18), the dedicated architecture manager (19) communicates with the dedicated architecture (15, 16, 17) assigned to the selected communications network, and with the selected communications network itself, to perform the selected connection management function.

### **Descriptive Summary of the Prior Art**

Lantto relates to setting up a remote and secure access session from a computer to a data communications network, via a general packet radio service (GPRS) device, e.g., a mobile phone (see claim 1). The computer includes a remote access login (RAL) system for setting up the secure session. The RAL system includes a graphical user interface having “means for a user to perform a single connect activity.” The RAL system further includes a processing core that receives signals from the user interface and co-ordinates procedures for defining a packet data protocol (PDP) context and passing the context to the GPRS device (i.e., the mobile phone). Through the mobile

phone, a dial-up connection and virtual private network (VPN) are established between the computer and a VPN gateway within the data communications network. (See claim 20).

### **Patentability of New Independent Claims 18 and 31**

The rejections of claims 9-17 have been rendered moot by the cancellation of these claims. Accordingly, Applicant will address the patentability of the newly added claims over the cited prior art.

Claim 18 is directed to a terminal for providing simultaneous connection to multiple communications networks. The configuration of the elements recited in claim 18 may be understood by referring, for example, to Figure 1 of the present application (presented above). Claim 18 recites, *inter alia*, dedicated architectures (e.g., 15, 16, 17) connected to the user interface (e.g., 11), each of the dedicated architectures (e.g. 15, 16, 17) being configured for communication with at least one of the communications networks (e.g., 40, 41, 42, 50, 51, 52); and a dedicated architecture manager (e.g., 19) configured to provide simultaneous connection to more than one of the communications networks, the dedicated architecture manager (e.g., 19) being connected to the user interface (e.g., 11) and being connected between the dedicated architectures (e.g. 15, 16, 17) and a radio input/output of the terminal, wherein the dedicated architecture manager is configured to assign the dedicated architectures to respective ones of the communications networks.

Lantto, on the other hand, merely discloses a terminal that can connect to a single communications network, i.e., accommodate “a single connect activity,” with a packet data protocol (PDP) context link.

The Examiner relies on the background section of the present application for its disclosure that it is known under the ETSI standard to have simultaneous connections to multiple communications networks (see specification at page 2, line 35 to page 3, line 3). However, even assuming *arguendo* that one of ordinary skill in the art would have been motivated to modify Lantto to communicate with multiple networks as hypothesized by the Examiner, the prior art applied by the Examiner does not teach or suggest the particular configuration of components recited in claim 18.

Accordingly, claim 18 is deemed to be patentable over the combination of Lantto and what is deemed to be Applicant admitted prior art.

Independent claim 31 recites features similar to claim 18 and is therefore also deemed to be patentable over the applied prior art for reasons discussed above with respect to claim 18.

### **Patentability of Dependent Claims**

Claims 19-30 and 32-42, which each depend from one of independent claims 18 and 31, distinguish the invention over the applied prior art for reasons discussed above in regard to claims 18 and 31 as well as on their own merits.

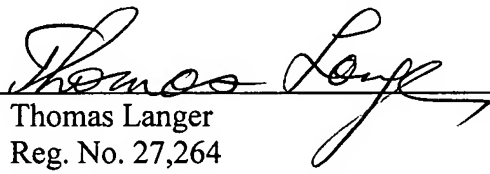
### **Conclusion**

Based on all of the above, it is respectfully submitted that the present application is now in proper condition for allowance. Prompt and favorable action to this effect and early passing of this application to issue are respectfully solicited.

Should the Examiner have any comments, questions, suggestions or objections, the Examiner is respectfully requested to telephone the undersigned in order to facilitate reaching a resolution of any outstanding issues.

It is believed that no fees or charges are required at this time in connection with the present application. However, if any fees or charges are required at this time, they may be charged to our Patent and Trademark Office Deposit Account No. 03-2412.

Respectfully submitted,  
COHEN PONTANI LIEBERMAN & PAVANE LLP

By   
Thomas Langer  
Reg. No. 27,264  
551 Fifth Avenue, Suite 1210  
New York, New York 10176  
(212) 687-2770

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